

Paul T. Trimmer
Nevada State Bar No. 9291
Lynne K. McChrystal
Nevada State Bar No. 14739
JACKSON LEWIS P.C.
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101
Tel: (702) 921-2460
Email: paul.trimmer@jacksonlewis.com
Email: lynne.mcchrystal@jacksonlewis.com

*Attorneys for Defendants Ramparts, LLC
dba Luxor Hotel & Casino, New Castle Corp.
dba Excalibur Hotel & Casino, Circus Circus Casino Inc.
dba Circus Circus Hotel & Casino*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE NEVADA RESORT
ASSOCIATION—INTERNATIONAL
ALLIANCE OF THEATRICAL STAGE
EMPLOYEES AND MOVING PICTURE
MACHINE OPERATORS OF THE UNITED
STATES AND CANADA, LOCAL 720,
PENSION TRUST; TRUSTEES OF THE
NEVADA RESORT 'ASSOCIATION
INTERNATIONAL ALLIANCE OF
THEATRICAL STAGE EMPLOYEES AND
MOVING PICTURE MACHINE OPERATORS
OF THE UNITED STATES AND CANADA,
LOCAL 720, WAGE DISABILITY TRUST;
and TRUSTEES OF THE NEVADA RESORT
ASSOCIATION—INTERNATIONAL
ALLIANCE OF THEATRICAL STAGE
EMPLOYEES AND MOVING PICTURE
MACHINE OPERATORS OF THE UNITED
STATES AND CANADA, LOCAL 720,
APPRENTICE AND JOURNEYMAN
TRAINING AND EDUCATION TRUST,

Plaintiffs,

vs.

RAMPARTS, LLC dba Luxor Hotel & Casino, a
Nevada limited liability company; NEW
CASTLE CORP. dba Excalibur Hotel & Casino,
a Nevada corporation; and CIRCUS CIRCUS
CASINOS INC. d/b/a CIRCUS CIRCUS
HOTEL & CASINO, a Nevada corporation,

Defendants.

Case No.: 2:19-cv-01536-RFB-BNW

**STIPULATION AND ORDER
EXTEND DISPOSITIVE MOTIONS
DEADLINES**

(Sixth and Final Request)

IT IS HEREBY STIPULATED by and between Plaintiffs, Trustees of The Nevada Resort Association—International Alliance of Theatrical Stage Employees and Moving Picture Machine Operators of The United States And Canada, Local 720, Pension Trust; Trustees of The Nevada Resort Association—International Alliance of Theatrical Stage Employees and Moving Picture Machine Operators of The United States and Canada, Local 720, Wage Disability Trust; and Trustees of The Nevada Resort Association—International Alliance of Theatrical Stage Employees and Moving Picture Machine Operators of The United States and Canada, Local 720, Apprentice and Journeyman Training and Education Trust (“Plaintiffs”), through their counsel The Urban Law Firm, and Defendants Ramparts, LLC dba Luxor Hotel & Casino, New Castle Corp. dba Excalibur Hotel & Casino,¹ Circus Circus Casinos Inc. dba Circus Circus Hotel & Resort,² (“Defendants”) through their counsel Jackson Lewis P.C., hereby stipulate and request to extend the dispositive motions deadline up to and including **August 5, 2022**. In support of this Stipulation and Request, the parties state the following:

1. The current deadline for filing dispositive motions in this case is **June 8, 2022**. Counsel for the parties propose that a new date for this deadline should be **August 5, 2022**.

2. Generally, the deadline for the joint pretrial order is 30 days after the dispositive motion deadline. *See* LR 26-1(b)(5). Thus, the current Joint Pretrial Order deadline in this case is **July 8, 2022**. Counsel proposes that the new date for this deadline is **September 5, 2022**. In the event the dispositive motions are pending before the Court on that date, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the date of the Court’s decision on the last dispositive motion.

3. The parties have retained The Honorable Peggy Leen (ret.) to mediate their dispute. The earliest date the parties could schedule for mediation with Judge Leen was **July 22, 2022**. The parties have confirmed and booked that date. If the parties are able to resolve their dispute at mediation, this would render any dispositive motions unnecessary. However, in the

¹ Defendant New Castle, LLC, is incorrectly named “New Castle Corp.” in the Complaint.

² The Complaint incorrectly identifies Circus Circus Casinos, Inc. dba Circus Circus Hotel & Resort as “dba Circus Circus Hotel & Casino.”

1 event that the dispute is not resolved, the Parties are requesting that the dispositive motions
2 deadline be moved to a date after the mediation date.

3 4. This request is made in good faith and not for the purpose of delay.

4 5. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
5 as waiving any claim and/or defense held by any party.

6 Dated this 10th day of May, 2022.

7 **THE URBAN LAW FIRM**

JACKSON LEWIS, P.C.

8 /s/ Michael A. Urban

/s/ Paul T. Trimmer

9 Michael A. Urban
Nevada Bar No. 3875
4270 S. Decatur Blvd., Suite A-9
10 Las Vegas, NV 89103
T: (702) 968-8087
11 F: (702) 968-8088

Paul T. Trimmer, Esq.
Nevada Bar No. 9291
Lynne K. McChrystal, Esq.
Nevada Bar No. 14739
300 S. Fourth St, Suite 900
Las Vegas, NV 89101
Phone: (702) 921-2460

12 *Counsel for Plaintiffs*

Counsel for Defendants

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16 **ORDER**

17 **IT IS SO ORDERED**

18 **DATED:** 11:46 am, May 11, 2022

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20 **BRENDA WEKSLER**
21 **UNITED STATES MAGISTRATE JUDGE**
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